

From: Rebecca L. Elkins

Subject: Classification of Commercial Credit Exposures

Date: Jun 13, 2005

Proposal: Interagency Proposal on the
Classification of Commercial Credit Exposures
Document ID: OP-1227
Document Version: 1
Press Release Date: 03/28/2005
Name: Rebecca L Elkins
Affiliation: Miner's and Merchants Bank & Trust
Company
Category of
Affiliation: Other
Address1: PO Box 1010
Address2:
City: Grundy
State: VA
Country: UNITED STATES
Country Code: 840
Zip: 24614
PostalCode: n/a

Comments:

@@@June 13, 2005

Jennifer J. Johnson, Secretary Dockety No. OP-1227
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Robert E. Feldman, Executive Secretary
Attn: Comments, Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

RE: Proposal to Change Loan Classification
FIL-22-2005
March 28, 2005

I am the Credit Administrator for Commonwealth Community Bank a branch of Miner's & Merchants Bank & Trust Company. This is a community bank with assets of around \$390 million. I am not in agreement with the proposal to change the Loan Classification. I feel the Borrower rating and Facility ratings would be more complex and more burdensome on smaller institutions. Why should this proposal apply to all banks? Why not propose a threshold for larger banks?

Please take this into consideration before making any changes in the current system.

Thank you.

Sincerely
Rebecca Elkins, Vice Presidnet/Credit Administrator

IP: 12.145.83.130
User Agent: Mozilla/4.0 (compatible; MSIE 6.0;
Windows NT 5.0)